

REMARKS

The Office Action dated June 30, 2003 has been reviewed and carefully considered. Claims 8-12 have been added. Claims 1-7 have been amended. Claims 1-12 are pending in this case, of which claims 1 and 10 are the independent claims. The Examiner's indication of allowable subject matter for claim 6 is appreciated. Reconsideration of the above-identified application, as amended and in view of the following remarks, is respectfully requested.

Claims 1, 5 and 7 stand rejected under 35 U.S.C. 103(a) as allegedly unpatentable over "SPIE Proceedings series, 1995" by Ahanger et al. ("Ahanger") in view of U.S. Patent No. 6,389,168 to Altunbasak et al. ("Altunbasak").

Claim 1 as amended recites "A video indexing device configured for . . . forming a descriptor that is configured to represent . . . motions of a camera . . . within any sequence of one or more frames of the video scene. . ." The flexibility of the invention for representing a wide range of temporal granularity – this flexibility being evident from the ability to represent even a single frame – is discussed in the specification (e.g., page 5, lines 22-24). Support for the amendment of claim 1 is found in the specification (e.g., page 5, lines 22-24: "single frame"; page 14, lines 6-16).

Ahanger, by contrast, fails to disclose or suggest the above-quoted limitation specifically recited in claim 1. Altunbasak also fails to disclose or suggest this limitation, and cannot make up for the deficiencies in Ahanger. Accordingly, for at least this reason, claim 1 is believed not to be rendered obvious by the proposed combination of references. Reconsideration and withdrawal of the rejection is respectfully requested.

Claim 2 stands rejected under 35 U.S.C. 103(a) as unpatentable over Ahanger in view of Altunbasak and U.S. Patent No. 5,267,034 to Miyatake et al. (“Miyatake”).

Miyatake operates by correlating the “displacement between frames” (Summary of the Invention: col. 2, lines 37-38), and does not disclose or suggest a descriptor for a single frame. For at least this reason, Miyatake fails to disclose or suggest, alone or in combination with Ahanger and Altunbasak, “A video indexing device configured for . . . forming a descriptor that is configured to represent . . . motions of a camera . . . within any sequence of one or more frames of the video scene. . .” as explicitly recited in claim 1 and therefore in dependent claim 2. For at least this reason, the proposed combination of references fails to render obvious the invention as recited in claim 2. Reconsideration and withdrawal of the rejection is respectfully requested.

Claims 3 and 4 stand rejected under 35 U.S.C. 103(a) as unpatentable over Ahanger in view of Altunbasak and U.S. Patent No. 5,929,940 to Jeannin.

Claims 3 and 4 depend from claim 1, and Jeannin, which is directed to motion estimation, fails to disclose or suggest, alone or in combination with the above-indicated references, “A video indexing device configured for . . . forming a descriptor that is configured to represent . . . motions of a camera . . . within any sequence of one or more frames of the video scene. . .” as explicitly recited in claim 1 and therefore in dependent claims 3 and 4. For at least this reason, the proposed combination of references fails to render obvious the invention as recited in claims 3 and 4. Reconsideration and withdrawal of the rejection is respectfully requested.

In addition, the Official Notice taken with respect to claim 4 is traversed. The applicant notes that Official Notice should only be taken for statements that are unquestionably well-known and capable of instant verification. See MPEP 2144.03.

For at least all of the above reasons, the proposed combination would not have rendered claims 3 or 4 obvious. Reconsideration and withdrawal of the rejection is respectfully requested.

The other rejected claims each depend from base claim 1 which has been shown to be patentable and are likewise deemed to be patentable, although they each warrant consideration based on their own merits.

Claim 6 was objected to as dependent upon a rejected base claim, claim 1, but was deemed by the Examiner to be allowable if redrafted into independent form. Having shown above that claim 1 is allowable, dependent claim 6 is likewise allowable.

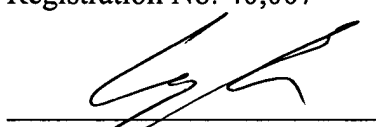
Claims 8-12 have been added to further emphasize what the applicant regards as the invention. Support for claims 8-12 is found in the specification (e.g., page 4, line 30 – page 5, line 4; page 14, lines 6-16).

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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Date: 9/30/03

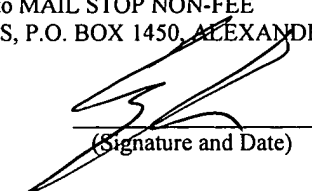

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